

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

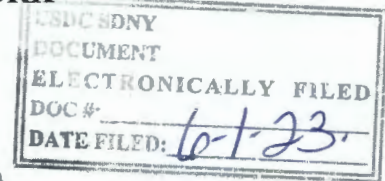
EDMAR FINANCIAL COMPANY, LLC; IRISH
BLUE & GOLD, INC.; and XTX MARKETS
LIMITED,

Plaintiffs,

v.

CURRENEX, INC.; GOLDMAN SACHS & CO.
LLC; HC TECHNOLOGIES, LLC; STATE
STREET BANK AND TRUST COMPANY;
STATE STREET GLOBAL MARKETS
INTERNATIONAL LIMITED; and JOHN DOE
DEFENDANTS 1-5,

Defendants.



Case No. 1:21-cv-06598 (LAK)

**JOINT STIPULATION AND ~~PROPOSED~~ ORDER REGARDING THE SCHEDULE
FOR FILING ANSWERS TO PLAINTIFFS' AMENDED COMPLAINT**

WHEREAS, on January 6, 2022, Plaintiffs Edmar Financial Company, LLC, Irish Blue & Gold, Inc., and XTX Markets Limited (together, "Plaintiffs") filed an amended class action complaint (the "Amended Complaint") against Defendants Currenex, Inc., State Street Global Markets International Limited, Goldman Sachs & Co. LLC, HC Technologies, LLC, State Street Bank and Trust Company, and John Doe Defendants 1-5 (collectively, "Defendants") (Dkt. No. 41);

WHEREAS, on March 18, 2022, Defendants moved to dismiss the Amended Complaint (Dkt. Nos. 53, 56);

WHEREAS, on May 20, 2022, Plaintiffs filed their oppositions to Defendants' motions to dismiss (Dkt. No. 64, 65);

WHEREAS, on July 18, 2022, Defendants filed their replies to Plaintiffs' oppositions (Dkt. Nos. 73, 74);

WHEREAS, on May 18, 2023, the Court issued an Opinion (the "Opinion"), granting in part and denying in part Defendants' motions to dismiss (Dkt. No. 83);

WHEREAS, pursuant to the Opinion, Defendant State Street Global Markets International Limited was dismissed from the action, while Defendants Currenex, Inc., Goldman Sachs & Co. LLC, HC Technologies, LLC, and State Street Bank and Trust Company remain in the action (the "Remaining Defendants");

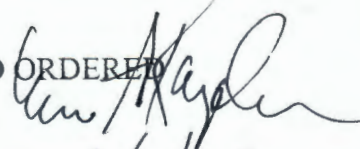
WHEREAS, pursuant to the Opinion, Plaintiffs have the option to elect to amend the Amended Complaint by June 19, 2023; and

WHEREAS, there has been no prior request for an extension of Remaining Defendants' answer deadlines in this action since the Opinion.

NOW, THEREFORE, IT IS HEREBY STIPULATED AND AGREED, by and among the undersigned counsel for the signatory parties, subject to the Court's approval, that:

1. If Plaintiffs do not elect to amend the Amended Complaint, Remaining Defendants must file their answers to Plaintiffs' Amended Complaint by July 7, 2023.
2. If Plaintiffs elect to amend the Amended Complaint, the parties will meet and confer concerning the deadline for Remaining Defendants to respond to this further amended complaint, including discussing a briefing schedule for any potential motion(s) to dismiss.
3. Nothing in this stipulation prevents any party from seeking further extensions on the consent of the parties or from the Court.
4. Nothing in this stipulation is intended to curtail the rights under the Federal Rules that might otherwise exist absent this agreement.

SO ORDERED


6/1/23
LEWIS A. KAPLAN, USDJ

IT IS SO ORDERED.

DATED: _____

THE HONORABLE LEWIS A. KAPLAN
UNITED STATES DISTRICT JUDGE

Dated: May 31, 2023
New York, New York

QUINN EMANUEL URQUHART &
SULLIVAN, LLP

/s/ Daniel L. Brockett

Daniel L. Brockett
Steig D. Olson
Christopher M. Seck
51 Madison Avenue, 22nd Floor
New York, New York 10010
Telephone: (212) 849-7000
Facsimile: (212) 849-7100
Email: danbrockett@quinnemanuel.com
Email: steigolson@quinnemanuel.com
Email: christopherseck@quinnemanuel.com

Jeremy D. Andersen (*pro hac vice*)
865 South Figueroa Street, 10th Floor
Los Angeles, California 90017
Telephone: (213) 443-3000
Facsimile: (213) 443-3100
Email: jeremyandersen@quinnemanuel.com

RUDDY GREGORY, PLLC

Mark Ruddy
1225 15th Street NW
Washington, DC 20005
Telephone: (202) 797-0762
Facsimile: (202) 318-0543
Email: rnruddy@ruddylaw.com

*Counsel for Plaintiffs and the Proposed
Class*

ROPES & GRAY LLP

/s/ Gregg L. Weiner

Gregg L. Weiner
Alexander B. Simkin
1211 Avenue of the Americas
New York, New York 10036
Telephone: (212) 596-5000
Facsimile: (212) 596-9090
Email: gregg.weiner@ropesgray.com
Email: alexander.simkin@ropesgray.com

Robert G. Jones (*pro hac vice*)
800 Boylston Street
Boston, Massachusetts 02199
Telephone: (617) 951 7000
Facsimile: (617) 951 7050
Email: robert.jones@ropesgray.com

Samer Musallam (*pro hac vice*)
2099 Pennsylvania Avenue NW
Washington, DC 20006
Telephone: (202) 508-4600
Facsimile: (202) 508-4650
Email: samer.musallam@ropesgray.com

*Counsel for Defendants Currenex, Inc. and
State Street Bank and Trust Company*

KATTEN MUCHIN ROSENMAN LLP

/s/ Peter G. Wilson

Peter G. Wilson
Christian T. Kemnitz
Elliott M. Bacon
Hannah O. Koesterer
525 W Monroe Street
Chicago, IL 60661
Telephone: (312) 902-5200
Email: peter.wilson@katten.com
Email: christian.kemnitz@katten.com
Email: elliot.bacon@katten.com
Email: hannah.koesterer@katten.com

Counsel for Defendant HC Technologies, LLC

CLEARY GOTTlieb STEEN &
HAMILTON LLP

/s/ Carmine D. Boccuzzi Jr.

Carmine D. Boccuzzi Jr.
Rishi N. Zutshi
One Liberty Plaza
New York, NY 10006
Telephone: (212) 225-2000
Email: cboccuzzi@cgsh.com
Email: rzutshi@cgsh.com

*Counsel for Defendant Goldman Sachs & Co.
LLC*

I, Gregg L. Weiner, am the ECF user whose username and password are being used to file this JOINT STIPULATION AND [PROPOSED] ORDER REGARDING THE SCHEDULE FOR FILING ANSWERS TO PLAINTIFFS' AMENDED COMPLAINT. I hereby represent that all signatories to this document have concurred in this filing.

Dated: May 31, 2023
New York, New York

ROPES & GRAY LLP

/s/ Gregg L. Weiner

Gregg L. Weiner